

E.DSO Feedback Response to the Energy Performance of Buildings Directive

The recast of the Energy Performance of Buildings Directive should serve to set the EU's building stock on the road to deep renovation in line with the 2050 carbon neutrality goals. The building sector has great potential for improved energy savings, and regulations for new buildings already set stringent requirements for energy efficiency.

E.DSO represents more than 350 million customers connected to 38 DSOs from all over Europe. Distribution System Operators are the key enablers of the energy transition fostering the integration of renewable energy sources, the deployment of energy efficient solutions and the empowerment of customers.

The Directive is fully relevant to DSOs in view of their role for the integration of EVs, RES and flexibility services and the deployment of smart grids. In general, we welcome the Commission's efforts to address the need to improve the energy performance of Europe's building stock.

E.DSO raises the following concerns and proposes the following recommendations:

- The recast must close the gap and market failure in managing energy needs of buildings. The EPBD should accelerate the decarbonization of buildings by reaping the benefits of energy efficiency and flexibility. It should advance consumer empowerment and the deployment of cost-efficient solutions.
- The EPBD should better support switching to zero-emission and low-carbon energy solutions such as electricity-based appliances (e.g. electric heat pumps). They improve energy efficiency and reduce carbon emissions. Similarly, recharging infrastructure contributes to system integration (transport-energy) and carbon reduction targets.



E.DSO's feedback is tailored towards a forward-looking recast based on:

- Decarbonisation of buildings through **energy efficiency & flexibility**.
- Support of **switching to zero-emission low-carbon energy solutions**.
- Acknowledgment of the benefits of connection to **the public distribution grid** for security and quality of supply and for system integration.
- Recognition of the importance of **smart meters** for system integration and energy efficiency. Data provided by smart meters is a reliable source of information to increase energy savings through renovation.
- Facilitated deployment of electricity **smart technologies** which empower consumers and increase the efficiency of the system.
- The building of **a holistic infrastructure for sustainable mobility** which contributes to integration between the transport and energy sectors.
- A robust framework for **data exchange and interoperability** supporting the integration of RES and flexibility services.

Issues

Article 2 (2)
Definition of a
“zero-emission
building”

&

Annex III
Requirements for
zero-emission
buildings and
calculation of life-
cycle global
warming potential

E.DSO Position & Recommendations

The definition of a “zero-emission building” **should not treat the grid as secondary** to be used only when other sources are not feasible. Grid connection is currently the main way to supply most buildings with electricity. It allows the energy sharing between residential and non-residential buildings, as well as between the different geographical typologies (e.g., rural areas and cities). **The grid is central to the security and quality of supply**. A shared approach to meeting electricity needs benefits all sides by decreasing storage needs and generation costs. For this reason, the possibility to cover a building's energy needs with **electricity from the grid must be recognised as equally compliant** with the definition of zero-emission buildings.

Issues

E.DSO Position & Recommendations

Article 2 (34)
Definition of
Smart Charging

Indicators for
Smart Readiness
of Buildings

The proposal rightly acknowledges the role of **smart meters** for the smart readiness indicators but should mention smart meters in the definition of smart charging. **Smart meters incentivise efficiency by encouraging behavioural changes.** They are a central source of information to indicate energy savings for national building renovation plans (**Article 3**) and renovation passports (**Article 10**).



Article 2 (49)
Definition of
'dedicated
distribution
networks'

The **requirement for 'dedicated distribution networks'** in the definition of 'energy from renewable sources produced nearby' **must be removed** since it goes against the efficiency targets. The public network allows consumers to choose electricity providers under the principles of freedom of choice and non-discrimination. In comparison, costly private networks only serve certain consumers and producers leaving the more **vulnerable customers to bear all the costs.**



Article 3
National Building
Renovation Plans

The National Building Renovation Plan, substituting the long-term renovation strategy, should encourage the deployment of **smart technologies** for consumer empowerment.



Article 14
Data Exchange
and Access by
DSOs

Article 14 should specify that **data from electricity smart meters should be accessible by DSOs**, as stated in Directive 944/2019, free of charge. This should be the case especially for data necessary to support **cost-effective network operation.** To integrate flexibility services, we need a robust framework for communication between buildings and the grid operator.

Issues

Article 12 Infrastructure for sustainable mobility

E.DSO Position & Recommendations

The requirements of paragraphs (1), (2) and (4) are a step forward to system integration. However, the following recommendations can improve it:

- Recharging points should be **technically ready to be equipped for smart charging**.
- The installation of charging points or pre-cabling must be pre-evaluated for network availability by DSOs. The requirements to install charging points, as set out in this Article, should be pursued only with DSO confirmation that there is **sufficient network availability**. In case such confirmation is not given, the plan for installation should also provide how this will be solved.
- **Article 12 (4)**. New residential buildings and residential buildings subject to major renovations should ensure the installation of charging infrastructure (at least one recharging point for every five parking spaces), as set for non-residential buildings. **EV charging will largely happen at home**.
- The EPBD should mandate the installation of charging infrastructure in non-residential buildings with fewer than 20 parking spaces which are not undergoing major renovation.
- **Article 12 (1) and (4)**. The requirement to dimension pre-cabling to enable simultaneous use of all recharging points must be replaced. Smart charging functionalities would be more beneficial for load management. **The Directive must not prevent the development of models allowing for smart management** of the electric vehicles of a building.
- The many differentiations between categories of buildings risks leading to administrative confusion. The Directive should consider grouping of categories to increase regulatory clarity.

E.DSO is a European association gathering leading electricity distribution system operators (DSOs) shaping smart grids for your future.